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RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

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Attorneys for Defendants SuperShuttle
International, Inc.; SuperShuttle Franchise
Corporation, and Veolia Transportation
Services, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DISTRICT

ADR

ROOSEVELT KAIRY, LARRY BROWN,
WAYNE DICKSON, AND DRAKE OSMUN,
on behalf of themselves, all other similarly
situated, and the general public,,

Plaintiffs,

vs.

SUPERSHUTTLE INTERNATIONAL, INC.;
SUPERSHUTTLE FRANCHISE
CORPORATION, AND VEOLIA
TRANSPORTATION SERVICES, INC., dba
SUPERSHUTTLE, AND DOES 1 through 20,
inclusive,

Defendants.

Case No.:

C08-02993

DECLARATION OF JUDY
ROBERTSON IN SUPPORT OF
NOTICE OF REMOVAL

[Filed Concurrently with Notice of Removal
of Defendant SuperShuttle International,
Inc. and Declaration of Andre Y. Bates in
Support of Removal]

FILE BY FAX

1 I, Judy Robertson, declare as follows:

2 1. I am the Vice President, Regulatory Affairs of SuperShuttle International, Inc. I
3 am submitting this Declaration in support of SuperShuttle International's removal petition in the
4 above-captioned action. Through my employment with SuperShuttle International I have personal
5 knowledge of the matters set forth below, and if called as a witness, I could and would
6 competently testify thereto.
7

8 2. In my position as Vice President, Regulatory Affairs I am familiar with the
9 corporate filings of SuperShuttle International. SuperShuttle International is a Delaware
10 Corporation with its principal place of business and corporate headquarters in Scottsdale, Arizona.

11 3. At paragraph 34 of the complaint, Plaintiffs allege that the proposed class consists
12 of "[a]ll persons who are or have operated as [SuperShuttle] drivers" in California "during the
13 period commencing four years from the filing of this action through the entry of final judgment in
14 this action."
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16 4. I have reviewed the complaint in this case. In my position as Vice President,
17 Regulatory Affairs, I am familiar with the number of franchisees in California who have entered
18 into SuperShuttle Unit Franchise Agreements. In reviewing the franchisee records I have
19 ascertained the approximate number of franchisees in California for each of the past 4 years. In
20 the year 2004 there were 228 franchisees, in 2005 there were 230 franchisees, in 2006 there were
21 317 franchisees, in 2007 there were 330 franchisees and in 2008 there are 328 franchisees. In
22 addition to the current franchisees, there are 404 former franchisees.
23

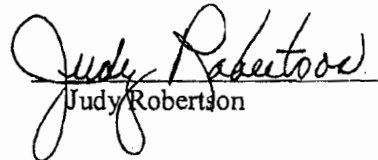
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1 I declare, under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

3 Executed this 17th day of June, 2008 in Thousand Oaks, California.
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6 Judy Robertson
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